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Attorneys for Defendant **CROWN EQUIPMENT  
CORPORATION dba CROWN LIFT TRUCKS**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

CYNTHIA MAHON and GARY MARKLEY, )  
Plaintiff, )  
v. )  
CROWN EQUIPMENT CORPORATION, )  
dba CROWN LIFT TRUCKS, and DOES 1 )  
through 50, inclusive, )  
Defendants. )

No. 2:03-cv-1763-MCE-DAD

**STIPULATION TO EXTEND  
DEADLINES AND TRIAL DATE;  
ORDER**

IT IS HEREBY STIPULATED by and between the parties, through their respective attorneys of record, in accordance with Local Rule 83-141, that the deadlines related to this matter should be extended as described herein, for the following good cause:

1. Defense counsel assigned to try the case have both recently undergone invasive surgical procedures from which they continue to recover. Attorney Daniel Scully has undergone a total hip replacement. On August 4, 2006, attorney Douglas Sears has had brain surgery to relieve three subdural hematomas.

2. An extension of deadlines and the trial date set by this court is necessary in order for the defense to adequately prepare for trial.

3. The parties stipulate and propose that the deadlines set by the court should be extended as follows:

a) Discovery to be completed no later than October 20, 2006.

- 1           b)     Expert witness disclosure no later than November 17, 2006.
- 2           c)     All dispositive motions, except motions for continuances, temporary
- 3 restraining orders or other emergency applications shall be filed no later than December 15, 2006.
- 4           d)     Final Pre-trial Conference on February 26, 2007 at 1:30 p.m.
- 5           e)     Trial to commence on March 28, 2007 at 9:00 a.m. Parties to produce all
- 6 exhibits to the Court no later than 3:00 p.m. on March 21, 2007.

7           IT IS FURTHER STIPULATED that this Stipulation may be signed in counterparts and that

8 a signature by facsimile shall be deemed counsel's original signature.

9                               Respectfully Submitted,

10          Dated: 9/12/06

KERSHAW, CUTTER & RATINOFF, LLP

11                               /s/   Kerrie Webb

12                               \_\_\_\_\_  
C. BROOKS CUTTER  
13                               KERRIE WEBB  
Attorneys for Plaintiffs

14                               MATHENY, SEARS, LINKERT & LONG, LLP

15                               /s/   Sean D. Richmond

16          Dated: 09/12/06


17                               \_\_\_\_\_  
DOUGLAS A. SEARS  
18                               SEAN RICHMOND  
Attorneys for Defendants

19                               **ORDER**

20           IT IS HEREBY ORDERED that the above Stipulation between all parties is hereby approved,

21 the new dates pertaining to the above-referenced action shall be set forth as outlined above.

22          DATED: September 21, 2006

23                                 
24                               \_\_\_\_\_  
25                               MORRISON C. ENGLAND, JR.  
26                               UNITED STATES DISTRICT JUDGE

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